

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

William F Kaetz

RECEIVED

DEC 13 2016

AT 8:30 3:15 pm
WILLIAM T. WALSH, CLERK

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Educational Credit Management Corporation

Experian

TransUnion

Equifax

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	William F Kaetz
	Street Address	437 Abbott Road
	County, City	Paramus
	State & Zip Code	New Jersey, 07652
	Telephone Number	201 753 1063

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name Educational Credit Management Corporation (ECMC)
 Street Address 2, 1 Imation Pl,
 County, City Washington County, Oakdale
 State & Zip Code MN 55128

Defendant No. 2 Name Experian
 Street Address P.O. Box 4500
 County, City Collin County, Allen
 State & Zip Code TX 75013

Defendant No. 3 Name TransUnion
 Street Address P.O. Box 2000
 County, City Delaware County, Chester
 State & Zip Code PA 19022-2000

Defendant No. 4 Name Equifax
 Street Address PO Box 740256
 County, City Fulton County, Atlanta
 State & Zip Code GA 30374

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal Questions ☒ Diversity of Citizenship
☐ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship New Jersey

Defendant(s) state(s) of citizenship Minnesota, Texas, Pennsylvania, Georgia

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? New Jersey

B. What date and approximate time did the events giving rise to your claim(s) occur? March 6 2013

C. Facts:

What
happened
to you?

1) Plaintiff applied for Bankruptcy and received a Court Order discharging all debts that included debts managed by ECMC.

2) ECMC continued to collect a discharged debt and represented the law fraudulently.

3) ECMC furnished fraudulent information to the other defendants; Experian, TransUnion, and Equifax.

Who did
what?

4) Plaintiff contacted defendants multiple times explaining that the debts are discharged via Bankruptcy.

5) Defendants refused to accept the Federal Court Order and plaintiff's letters

6) As recent as July 27, 2016, ECMC is attempting to collect federally discharged debts.

Approximately one year ago was the last letters sent to the other defendants.

Was
anyone
else
involved?

7) The other defendants; Experian, TransUnion, and Equifax, have sided with ECMC to keep the discharged debt as non-discharged debts continuing illicit debt collection practices.

8) Defendants recorded fraudulent negative information on plaintiff's credit reports

9) Defendants deprived Plaintiff of the "fresh start" the Bankruptcy was supposed to accomplish and continued the hardship the Bankruptcy Court order was supposed to relieve.

Who else
saw what
happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. _____

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

It will be 1500 days since Jan 28 2013, the Bankruptcy Court Order. The defendants parked their negative information on Plaintiff's property, His reputation, at the time of the "fresh start" he was supposed to have after the Court Order. Can one get a parking ticket and leave a car illegally parked indefinitely? No, one gets a ticket each day it's there. In the same way of thinking, 15 U.S.C. §.1692 et seq -15 U.S.C.s.1681 et seq - and Civil Contempt consider liabilities for each occurrence. The average amount is \$1000 for each occurrence of a violation. The amount Plaintiff is seeking is \$1000 times 1500 days totaling \$1,500,000.00 from each defendant Sub total of \$6,000,000.00 times four (4) for each account illegally collected and illegally recorded for a grand total of \$24,000,000.00 from each defendant. This will bring the final total of the complaint to \$96,000,000.00.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 18 day of DECEMBER, 2016.

Signature of Plaintiff

William F. Katz

Mailing Address

437 ABBOTT RD
PARSONS NJ
07652

Telephone Number

201 753 1063

Fax Number (if you have one)

E-mail Address

BILLKATZ @ VERIZON.NET

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff:

William F. Katz